

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANTHONY DALE, BRETT JACKSON,  
JOHNNA FOX, BENJAMIN  
BORROWMAN, ANN LAMBERT,  
ROBERT ANDERSON, and CHAD  
HOHENBERY on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

DEUTSCHE TELEKOM AG, and T-  
MOBILE US, INC.,

Defendants.

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

**JOINT STATUS REPORT**

Pursuant to this Court's instruction at the February 6, 2024, status hearing to file a joint status report seven days before future status hearings, Plaintiffs, Defendant T-Mobile US, Inc. ("T-Mobile"), and Defendant Deutsche Telekom AG ("DT"), together "the parties," respectfully submit this Joint Status Report. The parties do not see a need for court intervention on any issue at the present time.

**I. Discovery Progress**

Plaintiffs and T-Mobile continue to meet and confer productively on discovery, including:

- T-Mobile's Responses and Objections to Plaintiffs' First Set of Requests for Production of Documents;
- Use of Search Terms and/or Technology-Assisted Review;
- T-Mobile's Custodians;
- Plaintiffs' Responses and Objections to T-Mobile's First Set of Requests for Production of Documents and First Set of Interrogatories;
- Proposed 502(d) Protective Order;
- Proposed Deposition Protocol; and

- Proposed Expert Stipulation.

Plaintiffs and T-Mobile anticipate resolving these issues through their ongoing meet and confer process. If any issue requires the Court's intervention at the time of the June Status Conference, the parties will present it then, or at such time as the issue is ripe for Court guidance or resolution. T-Mobile has produced a number of documents responsive to Plaintiffs' First Set of Requests for Production of Documents and will continue to make productions on a rolling basis. Plaintiffs have also begun to meet and confer with AT&T, Inc., Verizon Communications Inc., and DISH Network Corporation regarding Plaintiffs' requests for production of documents to those non-parties.

## **II. Deutsche Telekom AG**

DT received service on February 27, 2024, through the Hague Convention. On March 21, 2024, the Court granted Plaintiffs and DT's stipulated motion for an extension until April 9, 2024, for DT to file its Motion to Dismiss. On March 27, 2024, Plaintiffs and DT entered a stipulation of dismissal as to DT, *see* Dkt. No. 177, which the Court approved on March 28, 2024, *see* Dkt. No. 178.

## **III. Pending Submission**

The following submission remains pending with the Court: the parties' Joint [Proposed] Order Re Protocol for the Production of Electronically Stored Information (ESI), submitted to the Court on October 16, 2023.

Dated: March 29, 2024

/s/ Brendan P. Glackin

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**CERTIFICATE OF SERVICE**

I, Brendan P. Glackin, an attorney, hereby certify that this **Joint Status Report** was electronically filed on March 29, 2024, and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

Respectfully submitted,

/s/ Brendan P. Glackin

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